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OFFICE OF
GENERAL COUNSEL

May 23, 2018

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Office of General Counsel
Federal Election Commission
1050 First Street, NE
Washington, D.C. 20463

U.S. Department of Justice
Public Integrity Section
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530-0001

MUR # 7404

Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Internal Revenue Service
Stop 31313
Fresno, CA 93888

Subject: Complaint for Federal Campaign Finance Violations for Unreported In-Kind Assistance Against Congressman Andre Carson's Campaign, Misuse of FCC license by Urban One, WTLC 106.7 and A.M. 1310; the George P. Stewart Company and its newspaper the Indianapolis Recorder; Gannett Inc. and its newspaper, the Indianapolis Star for Conspiracy to Violate Campaign Finance Laws and Injure the Congressional Campaign of Pierre Quincy Pullins and for Possible Unreported Payment of Monies to do the aforementioned.

This is a sworn complaint against Congressman Andre Carson and his campaign. It is also a complaint against Urban One Inc. and its employees at their radio station, WTLC, in Indianapolis, IN. It is also a complaint against the George P. Stewart Company and its newspaper, the Indianapolis Recorder and Gannett Inc. and its newspaper the Indianapolis Star.

Pierre Quincy Pullins believes and alleges the aforementioned individual and entities and their employees engaged in a conspiracy to suppress and injure Pullins' congressional campaign and message. Pullins believes they did this by excluding him from being interviewed along with the other Democrat candidates as was the case with Urban One's WTLC's AM 1310 show the "Community Connection" that caters to the African-American community. Pullins was also excluded from being interviewed with the other Democrat candidates in the congressional race against Carson by the Indianapolis Recorder, a

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newspaper that also caters to the African-American community. The Indianapolis Recorder even took a thumbnail picture of Pullins and put it with the Republican candidates photos and printed that he (Pullins) was unavailable to be interviewed at press time, which was not true. Pullins can't find where the Recorder ever tried to contact him and does not believe they did try to contact him. Pullins believes this was a coordinated attempt by WTLC and the Indianapolis Recorder to suppress votes for Pullins and help the Carson campaign. It was targeted at the African-American community and Pullins believes that is a civil rights violation. Pullins believes the host of the radio show, Terri "Dee" and the Indianapolis Recorder President and General Manager, Shannon Williams, go to the same church, and have known each other for years. In 2008, Terri Dee tried to ban Pullins from her then show, the "Chat Room" on the same station. Pullins sued the Indianapolis Recorder in 2007, thus Pullins doesn't believe this was a mistake. Pullins even asked the radio station's general manager, Deon Levingston, in an email if all of the candidates could be interviewed before the primary election. They all were but Pullins was not asked to participate even though Pullins believes Terri Dee knew he was a candidate. Pullins has responses from Terri Dee and Deon Levingston. None cite FCC regulations or exemptions. Pullins believes he was deliberately excluded by WTLC and the Indianapolis Recorder because he was the only candidate demanding Congressman Andre Carson answer to allegations of whether or not he (Carson) has sex harassment charges filed against him in Congress; and if there were any taxpayer funded payments to settle any potential claims against him? Pullins was calling the radio station using his name to push that question. Pullins also used his Facebook to ask the question. Pullins also believes the Carson campaign (or Carson himself) may have paid them (WTLC, Indianapolis Recorder and persons at the Indianapolis Star) through inflated advertisement or made direct cash payments to them.

The Indianapolis Star has a history of treating Pullins differently from other candidates to the benefit of Carson. In their 2018 Primary Election Guide, Pullins was offered the opportunity to participate in their election guide. In 2012 or 14, Pullins' comments about firing FBI Director James

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Comey then, were edited out, so this time (2018) Pullins sent the Indianapolis Star editors an email asking they not do that this time. Pullins put the demand that Congressman Carson answer questions about any harassment allegations in his comments. Even though the Indianapolis Star stated they reserve the right to edit for content and clarity, The Indianapolis Star sent Pullins an email stating that his comments had been approved. A week before the primary election, the Indianapolis Star edited out Pullins' question demanding Congressman Carson respond to harassment allegations.

It appears that the Indianapolis Star, the Indianapolis Recorder and WTLC radio coordinated their "news coverage" with the Carson campaign on a matter of public concern (election) to shield him from responding to questions that he didn't want to respond to in an environment where claims of sexual harassment complaints have felled other congressman. That censorship by these news organizations was a great boon to Carson and potentially saved him from spending money to counter any negative news. Their "news coverage" was designed to censor Pullins. Pullins believes that coordinated activity between any media entity and a political campaign is a violation of campaign finance laws and FCC broadcast rules. Pullins believes and alleges the aforementioned media entities coordinated their reporting with the Carson campaign and may have received unreported monies to do so. On 5/24/2018 at about 13:17 hours, Pullins called into show, the "Community Connection" hosted by Terri Dee and asked her over the airwaves, "How is it that you can talk about Bill Cosby and now, Morgan Freeman, but not ask Congressman Andre Carson to respond to misconduct allegations." Or something to that effect. Terri Dee replied, "Because it's my preference." Pullins believes this is a violation of the First Amendment, especially since the show is promoted as a public forum.

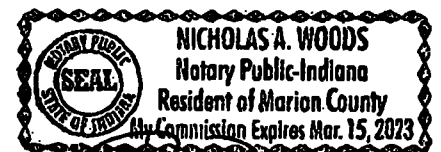
Respectfully Submitted under penalty of perjury.

Complainant: *Pierre Quincy Pullins*
Pierre Quincy Pullins

Indianapolis, Indiana 46224

5/29/2018

Signed and Sworn to before me.
NOTARY



Notary Seal
5-29-2018